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11 Attorney for Defendant
12 LINCOLN LIFE ASSURANCE COMPANY
13 OF BOSTON

14 UNITED STATES DISTRICT COURT

15 WESTERN DISTRICT OF WASHINGTON – SEATTLE DIVISION

16 SAMANTHA BLAKE

17 Case No. 2:22-cv-00021-RSM

18 Plaintiff,

19 **STIPULATION AND ORDER TO
20 EXTEND TIME TO RESPOND TO
21 COMPLAINT AND TO MODIFY THE
22 DEADLINES SET BY THE COURT'S
23 SCHEDULING ORDER**

24 U.S. ROCHE HEALTH AND
25 WELFARE VEBA PLAN; U.S.
ROCHE LONG-TERM DISABILITY
PLAN; and LINCOLN LIFE
ASSURANCE COMPANY OF
BOSTON f/k/a/ LIBERTY LIFE
INSURANCE

Defendants.

26 Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiff Samantha Blake (“Plaintiff”)
27 and Defendant Lincoln Life Assurance Company of Boston (“Lincoln”), by and through
28 their respective counsel, hereby stipulate and request that this Court enter an Order
29 extending the time for Lincoln to respond to Plaintiff’s Complaint and modifying the dates
30 set by this Court’s January 24, 2022 Scheduling Order. The Parties state as follows:

31 1. On January 7, 2022, Plaintiff filed the instant lawsuit for disability benefits

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1 and attorneys' fees under the Employee Retirement Income Security Act of 1974 against
 2 Defendants U.S. Roche Health and Welfare VEBA Plan, U.S. Roche Long-Term Disability
 3 Plan, and Lincoln.

4 2. The Parties have conferred and agree to extend the time for Lincoln to
 5 respond to Plaintiff's Complaint by thirty (30) days, from the current date of February 8,
 6 2022, to March 10, 2022.

7 3. The Parties have further conferred and agree to extend the deadlines set by
 8 the Court's January 24, 2022 Scheduling Order as follows:

Event	Current Deadline	New Deadline
Rule 26(f) Conference	2/22/2022	3/24/2022
Initial Disclosures	2/28/2022	3/30/2022
Joint Status Report and Discovery Plan	3/07/2022	4/06/2022

14 4. A brief extension would allow Lincoln to more adequately investigate the
 15 allegations of the Complaint and enable the parties to engage in early resolution discussions
 16 and avoid the expenditure of unnecessary legal costs and judicial resources.

17 5. No prior extensions of time have been requested or granted.

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1 NOW, THEREFORE, THE PARTIES STIPULATE AS FOLLOWS:

2 The deadline for Defendant Lincoln Life Assurance Company of Boston to respond
 3 to Plaintiff's Complaint shall be extended from February 8, 2022 to March 10, 2022.
 4 Further, the deadlines set by the Court's January 24, 2022 Scheduling Order are extended
 5 as follows:

6 Event	7 Current Deadline	8 New Deadline
9 Rule 26(f) Conference	10 2/22/2022	11 3/24/2022
12 Initial Disclosures	13 2/28/2022	14 3/30/2022
15 Joint Status Report and 16 Discovery Plan	17 3/07/2022	18 4/06/2022

19 IT IS SO STIPULATED.

20 Dated: February 8, 2022

21 McDOWELL HETHERINGTON LLP

22 By: /s/ Jodi K. Swick
 23 Jodi K. Swick, WSBA No. 47626

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 25 14205 SE 36th Street., Suite 100
 14 Bellevue, WA 98006

15 Attorney for Defendant
 16 LINCOLN LIFE ASSURANCE COMPANY OF
 17 BOSTON

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1 Dated: February 8, 2022

NELSON LANGER ENGLE, PLLC

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3 By: */s/ Aaron I. Engle*
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ORDER

IT IS HEREBY ORDERED that the Parties' Stipulation is GRANTED, and the Court orders as follows:

1. Defendant Lincoln Life Assurance Company of Boston shall have until March 10, 2022 to Respond to Plaintiff's Complaint.
2. The deadlines set by the Court's January 24, 2022 Scheduling Order are extended as follows:

Event	Current Deadline	New Deadline
Rule 26(f) Conference	2/22/2022	3/24/2022
Initial Disclosures	2/28/2022	3/30/2022
Joint Status Report and Discovery Plan	3/07/2022	4/06/2022

IT IS SO ORDERED.

DATED this 10th day of February, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

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THE COURT'S SCHEDULING ORDER**

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1 Presented by:
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